IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA

UNITED STATES OF AMERICA, Plaintiff, v. LI SHAOMING, MO HAILONG, also known as Robert Mo, WANG LEI, WANG HONGWEI, YE JIAN, and LIN YONG, Defendants.	Case No. 4:13-CR-147 MOTION FOR LEAVE TO FILE UNDER SEAL

The Defendant, Mo Hailong requests this Court leave to file his reply brief in support of his motion to amend conditions of pretrial release under seal. In support of his motion, Mr. Hailong states as follows:

1. The undersigned counsel has filed a motion to amend Mr. Hailong's conditions of pretrial release. Dkt. No. 173. The government has resisted. Dkt. No. 185. Mr. Mo intends early on February 2, 2015 to file a short reply brief in support of the motion.

2. Due to extensive media interest in this case, including attempts to film the Defendant, the parties wish to keep the details of his conditions of his release confidential.

3. The government is in agreement with briefing regarding this motion being filed under seal.

WHEREFORE, the Defendant, Mo Hailong, prays this Court for an order granting his motion for leave to file the reply brief in support of his pending motion under seal.

WEINHARDT & LOGAN, P.C.

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PROOF OF SERVICE

The undersigned certifies that the foregoing instrument was served upon the parties to this action by serving a copy upon each of the attorneys listed below on Jan 30, 2015, by

- ☐ U.S. Mail
- ☐ FAX
- ☐ Hand Delivered
- ☐ Electronic Mail
- ☐ FedEx/ Overnight Carrier
- ☒ CM / ECF

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